# United States District Court

FOR THE NORTHERN DISTRICT OF CALIFORNIA

**VENUE: SAN FRANCISCO** 

MAY 14 2019

SUSAN Y. SOONG CLERK, U.S. DISTRICT COURT UNITED STATES OF AMERICA ORTH DISTRICT OF CALIFORNIA

V.

CR19 0226

LORENZO LEE, a/k/a "O.G.," et al.

DEFENDANT(S).

# INDICTMENT

VIOLATIONS: 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (Two Counts); 21 U.S.C. § 841(a)(1) - Distribution of Controlled Substances (Seven Counts); 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute Controlled Substances (Eight Counts); 21 U.S.C. § 856(a)(2) - Maintaining Drug-Involved Premises; 18 U.S.C. § 2 - Aiding and Abetting; 21 U.S.C. § 853 - Forfeiture Allegation

A true bill.  Ate Walt		
	Foreman	
Filed in open court this day of		
MAY 2019 - Moneyon	NO Clerk	BAIL ARREST WARRANT  Mc Coy, Polic,  Mannez - Dist - Alvanda  Lopez, Tores - Garari, Agrilar  NO PROCESS
Bail, \$		L. Lee, Jose Delgender.
Adu		Mar Defenso, D. Garhog, T. People, A. Brun
SALLIE KIN	Л	D. Garhos,
United States Magist	rate Judge	T. People, A. Brun

AO 257 (Rev. 6/78)	
DEFENDANT INFORMATION RELATIVE T	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION INDICTMENT	. Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDIN	NORTHERN DISTRICT OF CALIFORNIA
See attachment Petty	SAN FRANCISCO DIVISION
Mino	TAI 1 4 2019
Misd	DEFENDANT - U.S  SUSAN Y. SOONG NODTH, U.S. DISTRICT
□ meal	LORENZO LEE, a/k/a "O.G."  SUSAN Y. SOONG NORTH DISTRICT CO
PENALTY: See attachment	DISTRICT COURT NUMBER
PENALTY. See attachment	CR19 1 0226
	02120 0000
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (& Title, if any)	Has not been arrested, pending outcome this proceeding.  1) If not detained give date any prior
DEA	summons was served on above charges
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
Northern District of California	3) X Is on Bail or Release from (show District)
this person/proceeding is transferred from another district	Northern District of California
per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY
	4) On this charge
this is a reprosecution of	,, and shared
charges previously dismissed which were dismissed on motion SHOW	5) On another conviction
of:	).
U.S. ATTORNEY DEFENSE	If answer to (6) is "Yes", show name of institution
this prosecution relates to a	Has datainer Yes 1 If "Yes"
pending case involving this same defendant MAGISTRAT	give date
CASE NO.	DATE OF Month/Day/Year
prior proceedings or appearance(s)	ARREST
defendant were recorded under	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form AUSA Ryan Rezaei	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
■ U.S. Attorney ☐ Other U.S. Agency	/
Name of Assistant U.S.	This report amends AO 257 previously submitted
Attorney (if assigned) Casey Boome/Ryan Rezaei	FORMATION OF COMMENTS
PROCESS: ADDITIONAL INI	FORMATION OR COMMENTS ————————————————————————————————————
☐ SUMMONS ☑ NO PROCESS* ☐ WARRANT	Bail Amount:
If Summons, complete following: Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or
Defendant Address:	warrant needed, since Magistrate has scheduled arraignment
	Date/Time: Before Judge:
Comments:	



#### PENALTY SHEET

SUSAN Y. SOONG CLERK, U.S. DISTRICT COURT NORTH DISTRICT OF CALLEGRAM

# The defendants are charged as follows:

## 1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

# 3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a 14 2019

Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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#### 5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

#### 6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

## 8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

MAY 1 4 2019

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 849(6)(1)) AND ONG CLERK, U.S. DISTRICT COURT NORTH DISTRICT OF CALIFORNIA

# 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

# 10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

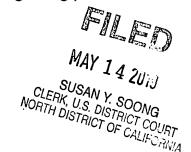
# 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

- 1. Imprisonment: Not less than 10 years but up to life
- 2. Fine: \$10 million
- 3. Supervised Release: Not less than 5 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture



Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

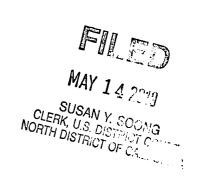
- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$1 million
- 3. Supervised Release: Not less than 3 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$500,000
- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO same as those pertaining to Counts 8, 10, 11, and 13
- 2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and 18



AO 257 (Rev. 6/78)

DEEENDANT INCODERATION DEL	A TIV / E TO	A ODIMINAL ACTION IN H.C. DIOTRICT COURT
		A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION IN	DICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED St	JPERSEDING	NORTHERN DISTRICT OF CALIFORNIA
See attachment	Petty	SAN FRANCISCO DIVISION
See attachment	☐ Minor	MAY 1 4 2019
	Misde-	CLERK, U.S. DISTRICT
	meanor	JEFFREY MCCOY NORTH DISTRICT COURT
	Felony	DISTRICT COURT NUMBER
PENALTY: See attachment		None South Notice In the Indian Incident Inciden
		CR19 0226
		0220
		DEFENDANT
PROCEEDING		IS NOT IN CUSTODY  Has not been arrested, pending outcome this proceeding.
Name of Complaintant Agency, or Person (& Title, if	any)	1) X If not detained give date any prior
DEA		summons was served on above charges
person is awaiting trial in another Federal or Sta	ate Court,	2) Is a Fugitive
— give name of court		3)  Is on Bail or Release from (show District)
		Northern District of California
this person/proceeding is transferred from anoth		Northern District of Camornia
per (circle one) FRCrp 20, 21, or 40. Show Dist	rict	IS IN CUSTODY
		4) On this charge
this is a reprosecution of		5) 🗔 .
charges previously dismissed which were dismissed on motion	SHOW	5) On another conviction Federal State
OI.	OCKET NO.	6) Awaiting trial on other charges
U.S. ATTORNEY DEFENSE		If answer to (6) is "Yes", show name of institution
this prosecution relates to a		
pending case involving this same		Has detainer Yes   If "Yes" give date
1	AGISTRATE CASE NO.	been filed? No filed
prior proceedings or appearance(s)	0/102/10.	DATE OF Month/Day/Year ARREST .
before U.S. Magistrate regarding this defendant were recorded under	19-70649	Or if Arresting Agency & Warrant were not
		DATE TRANSFERRED Month/Day/Year
Name and Office of Person  Furnishing Information on this form  AUSA Ryar	n Rezaei	TO U.S. CUSTODY
■ U.S. Attorney  Other U	J.S. Agency	
Name of Assistant U.S.		This report amends AO 257 previously submitted
Attorney (if assigned) Casey Boome/Ry		_
PROCESS: ADDIT	IONAL INFO	DRMATION OR COMMENTS —
	ARRANT	Bail Amount:
If Summons, complete following:		
Arraignment Initial Appearance		* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment
Defendant Address:		
		Date/Time: Before Judge:
Comments:		

#### PENALTY SHEET



The defendants are charged as follows:

# 1. LORENZO LEE, a/k/a "O.G."

CR19<sup>--</sup>0226

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

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Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing Detectable Amount of Heroin (21 U.S.C. § Colombia (22 U.S.C.)

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Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

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Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 9. JESSE LOPEZ, III

<u>Count 8</u>: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

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Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

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## 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

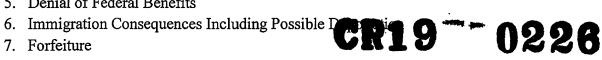
# 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

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- 3. Supervised Release: Not less than 5 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits



Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$1 million
- 3. Supervised Release: Not less than 3 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$500,000
- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO same as those pertaining to Counts 8, 10, 11, and 13
- 2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and 18

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CR19 0226

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION	LDELATIVE TO	A ODIMINAL ACTION IN ILO DISTRICT COURT
		D A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: L COMPLAINT L INFORMATION		Name of District Court, and/or Judge/Magistrate/Location
OFFENSE CHARGED ———	SUPERSEDIN	
See attachment	Petty	SAN FRANCISCO DIVISION AY 1
,	Minor	DEFENDANT - U.S CLESUSAN Y. SOC
	Misde mean	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	Felon	YALIFO TI
PENALTY: See attachment		None
		CD19 . 0226
		DEFENDANT
PROCEEDING _		IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (8	Title, if any)	Has not been arrested, pending outcome this proceeding.  1) If not detained give date any prior
DEA		summons was served on above charges
person is awaiting trial in another Federa	al or State Court,	2) Is a Fugitive
Northern District of Cali	fornia	3) 🔀 Is on Bail or Release from (show District)
this person/proceeding is transferred fro	m another district	Northern District of California
per (circle one) FRCrp 20, 21, or 40. Sh		IS IN CUSTODY
		4) On this charge
this is a reprosecution of charges previously dismissed		5)  On another conviction
which were dismissed on motion	SHOW DOCKET NO.	5) On another conviction Federal State
of:  U.S. ATTORNEY DEFENSE	) BOOKET NO.	6) Awaiting trial on other charges
	<u>J</u>	If answer to (6) is "Yes", show name of institution
this prosecution relates to a pending case involving this same		Has detainer Yes If "Yes"
defendant defendant	MAGISTRATE	I I I give date
prior proceedings or appearance(s)	CASE NO.	DATE OF Month/Day/Year ARREST
before U.S. Magistrate regarding this defendant were recorded under	3-19-70652	Or if Arresting Agency & Warrant were not
Name and Office of Person		DATE TRANSFERRED Month/Day/Year
Furnishing Information on this formAU	SA Ryan Rezaei	TO U.S. CUSTODY
☑ U.S. Attorney ☐	Other U.S. Agency	
	ome/Ryan Rezaei	This report amends AO 257 previously submitted
PROCESS:	ADDITIONAL INF	ORMATION OR COMMENTS —
☐ SUMMONS ☒ NO PROCESS*	WARRANT	Bail Amount:
If Summons, complete following:  ☐ Arraignment ☐ Initial Appearance		* Where defendant previously apprehended on complaint, no new summons or
Defendant Address:		warrant needed, since Magistrate has scheduled arraignment
		Date/Time: Before Judge:
Comments:		

#### PENALTY SHEET

# The defendants are charged as follows:

**CR19** 

0226



1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a, 4) (1) (1) (1) (2) (2)

#### 5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

# 6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

# 8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))



# 10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

## 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

## 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

- 1. Imprisonment: Not less than 10 years but up to life
- 2. Fine: \$10 million
- 3. Supervised Release: Not less than 5 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):



R19 0226

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$1 million
- 3. Supervised Release: Not less than 3 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$500,000
- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO same as those pertaining to Counts 8, 10, 11, and 13
- 2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and 18

CR19 0226

AO 257 (Rev. 6/78)	
DEFENDANT INFORMATION RELATIVE	TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION INDICTMEN	T Name of District Court, and/or Judge/Magistrate Location
SUPERSED	
OFFENSE CHARGED	SAN FRANCISCO DIVISION
See attachment Pe	14 2019
Mil	DEFENDANT - U.S SUSAN Y. SOONG
	CLERK, U.S. DISTRICT COURT  DESHAWNTE GAMBOA DISTRICT OF GALIFORNIA
₩ Fe	Iony
PENALTY: See attachment	DISTRICT COURT NUMBER
	North 1220
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY  Has not been arrested, pending outcome this proceeding.
Name of Complaintant Agency, or Person (& Title, if any)	1) If not detained give date any prior
DEA	summons was served on above charges
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
Northern District of California	3) 🗵 Is on Bail or Release from (show District)
this was a formal in the profession of from a subbandiction	Northern District of California
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	
	IS IN CUSTODY
	- 4) On this charge
this is a reprosecution of charges previously dismissed	5) On another conviction
which were dismissed on motion SHOW	Federal State
	6) Awaiting trial on other charges
U.S. ATTORNEY DEFENSE	If answer to (6) is "Yes", show name of institution
this prosecution relates to a	Yes I If "Yes"
pending case involving this same defendant MAGISTRA	give date
CASE NO	ined
prior proceedings or appearance(s)	DATE OF Month/Day/Year ARREST
defendant were recorded under	Or if Arresting Agency & Warrant were not
Name and Office of Person	DATE TRANSFERRED Month/Day/Year
Furnishing Information on this form AUSA Ryan Rezaei	TO U.S. CUSTODY
☑ U.S. Attorney ☐ Other U.S. Agend	cy
Name of Assistant U.S. Attorney (if assigned)  Casey Boome/Ryan Rezaei	This report amends AO 257 previously submitted
	NFORMATION OR COMMENTS ————————————————————————————————————
PROCESS:	Dell Amounts
SUMMONS NO PROCESS* WARRANT	Bail Amount:
If Summons, complete following: Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or
Defendant Address:	warrant needed, since Magistrate has scheduled arraignment
	Date/Time: Before Judge:
Comments:	

#### PENALTY SHEET

# The defendants are charged as follows:

CR19 0226



## 1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

# 3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

CR19

0226

## 5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

## 6. EVAN MARTINEZ-DIAZ

<u>Count 1</u>: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

#### 8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and



Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of FCC S§ 841(1)(2) 6 (b)(1)(A))

# 10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

## 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

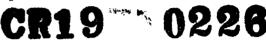
## 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

- 1. Imprisonment: Not less than 10 years but up to life
- 2. Fine: \$10 million
- 3. Supervised Release: Not less than 5 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture



Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$1 million
- 3. Supervised Release: Not less than 3 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$500,000
- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture



Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13



- 2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and 18

AO 257 (Rev. 6/78)

AO 237 (Nev. 070)	
DEFENDANT INFORMATION RELATIVE 1	TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDI	NORTHERN DISTRICT OF CALIFORNIA
See attachment Pet	SAN FRANCISCO DIVISION
Min	
Mis	DEI ENDAM GOGAN Y SENTAN
	CLERK, U.S. DISTRICT COURT  DEBORAH POLK NORTH DISTRICT OF CALIFORNIA
PENALTY: See attachment	DISTRICTION NOMBER 0226
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (& Title, if any)  DEA	Has not been arrested, pending outcome this proceeding.  1) X If not detained give date any prior summons was served on above charges
person is awaiting trial in another Federal or State Court,	2) Is a Fugitive
— give name or court	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY  4)  On this charge
this is a reprosecution of charges previously dismissed which were dismissed on motion of:  U.S. ATTORNEY DEFENSE	5) On another conviction Federal State  6) Awaiting trial on other charges  If answer to (6) is "Yes", show name of institution
this prosecution relates to a pending case involving this same defendant  MAGISTRAT	
prior proceedings or appearance(s)  before U.S. Magistrate regarding this	DATE OF Month/Day/Year ARREST
defendant were recorded under	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form AUSA Ryan Rezaei	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
□ U.S. Attorney       □ Other U.S. Agence	у
Name of Assistant U.S. Attorney (if assigned)  Casey Boome/Ryan Rezaei	This report amends AO 257 previously submitted
PROCESS: ADDITIONAL IN	FORMATION OR COMMENTS —
SUMMONS NO PROCESS* WARRANT	Bail Amount:
If Summons, complete following:	
Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment
Defendant Address:	Date/Time: Before Judge:
Comments:	

#### PENALTY SHEET

The defendants are charged as follows:

**CR19** 

0226

## 1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))



#### 4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))



#### 5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

#### 6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

#### 7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

#### 8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

# 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))



# 10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

## 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

- 1. Imprisonment: Not less than 10 years but up to life
- 2. Fine: \$10 million
- 3. Supervised Release: Not less than 5 years but up to life



- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Poss (R) 149 15 0226
- 7. Forfeiture

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$1 million
- 3. Supervised Release: Not less than 3 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$500,000
- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO same as those pertaining to Counts 8, 10, 11, and 13
- JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and 18

CR19 0226

AO 257 (Rev. 6/78)

AO 237 (Nev. 0170)	
DEFENDANT INFORMATION RELATIVE TO	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDIN	G NORTHERN DISTRICT OF CALIFORNIA
See attachment Petty	SAN FRANCISCO DIVÎSÎÔN
Minor	SUSAN Y. SOUNG  CLERK U.S. DISTRICT COURT
Misde	NORTH DISTRICT OF CALIFORNIA
☐ mean	or EVAN MARTINEZ-DIAZ
Felon	DISTRICT COURT NUMBER
PENALTY: See attachment	CR19 0226
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (& Title, if any)	Has not been arrested, pending outcome this proceeding.  1) X If not detained give date any prior
DEA	summons was served on above charges
person is awaiting trial in another Federal or State Court, give name of court	2) S a Fugitive
	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY
	4) On this charge
this is a reprosecution of charges previously dismissed which were dismissed on motion of:  U.S. ATTORNEY DEFENSE	5) On another conviction
this prosecution relates to a pending case involving this same defendant MAGISTRATE CASE NO.	l lied
prior proceedings or appearance(s)  before U.S. Magistrate regarding this defendant were recorded under	ARREST
	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form AUSA Ryan Rezaei	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
Name of Assistant U.S. Attorney (if assigned)  Casey Boome/Ryan Rezaei	This report amends AO 257 previously submitted
	ORMATION OR COMMENTS ————————————————————————————————————
PROCESS:  ☐ SUMMONS ☐ NO PROCESS* ☐ WARRANT	Bail Amount:
If Summons, complete following:  Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or
Defendant Address:	warrant needed, since Magistrate has scheduled arraignment
	Date/Time: Before Judge:
Comments:	

#### PENALTY SHEET

The defendants are charged as follows:

1. LORENZO LEE, a/k/a "O.G."







Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(2224))

#### 5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

## 6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

#### 8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

# 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

# 10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

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## 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

## 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

- 1. Imprisonment: Not less than 10 years but up to life
- 2. Fine: \$10 million
- 3. Supervised Release: Not less than 5 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Properties



Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$1 million
- 3. Supervised Release: Not less than 3 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$500,000
- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO same as those pertaining to Counts 8, 10, 11, and 13
- 2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and 18

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AO 257 (Rev. 6/78)

AO 257 (Rev. 6/76)	
DEFENDANT INFORMATION RELATIVE 1	TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: $\square$ COMPLAINT $\square$ INFORMATION $\boxtimes$ INDICTMENT	Name of District Court, and/or sudge/wagistrate Location
OFFENSE CHARGED SUPERSEDI	NORTHERN DISTRICT OF CALIFORNIA 2010
	SAN FRANCISCO DIVISION
See attachment Pet	CLERK, U.S. DISTRICT COUR
Mis	DETERMANT SISTEMATION OF CALIFORN
	anor MAGO AGUILAR-PACHECO
Feld Feld	DISTRICT COURT NUMBER
PENALTY: See attachment	None
	0000
	CKIS UZZO
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY  Has not been arrested, pending outcome this proceeding.
Name of Complaintant Agency, or Person (& Title, if any)	1) X If not detained give date any prior summons was served on above charges
DEA	_
person is awaiting trial in another Federal or State Court,	2) Is a Fugitive
give hame or count	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	
per (circle offe) FROID 20, 21, or 40. Show district	IS IN CUSTODY
	4) On this charge
this is a reprosecution of	E) Constitution
charges previously dismissed SHOW which were dismissed on motion	5) On another conviction Federal State
of: DOCKET NO	O.
U.S. ATTORNEY DEFENSE	If answer to (6) is "Yes", show name of institution
this proposition relates to a	
this prosecution relates to a pending case involving this same	Has detainer Yes If "Yes" give date
defendant MAGISTRAT	re   been filed? No filed
prior proceedings or appearance(s)	DATE OF Month/Day/Year ARREST
before U.S. Magistrate regarding this defendant were recorded under	Or if Arresting Agency & Warrant were not
	DATE TRANSFERRED Month/Day/Year
Name and Office of Person Furnishing Information on this form AUSA Ryan Rezaei	TO U.S. CUSTODY
■ U.S. Attorney   Other U.S. Agence	:y
Name of Assistant U.S.	This report amends AO 257 previously submitted
Attorney (if assigned) Casey Boome/Ryan Rezaei	
PROCESS: ADDITIONAL IN	IFORMATION OR COMMENTS ————————————————————————————————————
SUMMONS NO PROCESS* WARRANT	Bail Amount:
If Summons, complete following:	
Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment
Defendant Address:	
	Date/Time: Before Judge:
Comments:	

#### PENALTY SHEET



# The defendants are charged as follows:

1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Districtive Rd Loss s with Intended Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

# 2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing

Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Contain Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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### 5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

#### 6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C.  $\S\S 841(a)(1) \text{ and } (b)(1)(A))$ 

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

#### 7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

## 8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

# 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

10. JOSE DELGADILLO, a/k/a "Tep 10 0226

<u>Count 1</u>: Conspiracy to Distribute and Possess with Intent to Distribute Controlled
Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

## 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

## 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

- 1. Imprisonment: Not less than 10 years but up to life
- 2. Fine: \$10 million
- 3. Supervised Release: Not less than 5 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

**CR19** 

0226

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$1 million
- 3. Supervised Release: Not less than 3 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$500,000
- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO - same as those pertaining to Counts 8, 10, 11, and 13
- 2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and



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AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE T	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDII	NORTHERN DISTRICT OF CALIFORNIA
See attachment Pett	SAN FRANCISCO DIVISION
Mino	DEFENDANT - U.S
Misc	
□ mea	NODERK JAN L
PENALTY: See attachment	DISTRICT COURT NUMBER IS TO THE PROPERTY OF TH
	None
	CR19 0226
PROCEEDING	IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (& Title, if any)	Has not been arrested, pending outcome this proceeding.  1) X If not detained give date any prior
DEA	summons was served on above charges
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district	
per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY
	4) On this charge
this is a reprosecution of charges previously dismissed	5) On another conviction
which were dismissed on motion SHOW	Federal State
of:  U.S. ATTORNEY DEFENSE	6) Awaiting trial on other charges
U.S. ATTORNET	If answer to (6) is "Yes", show name of institution
this prosecution relates to a	Has detainer Yes If "Yes"
pending case involving this same defendant MAGISTRAT	l l dive date
prior proceedings or appearance(s)	DATE OF Month/Day/Year
before U.S. Magistrate regarding this	ARREST 7
defendant were recorded under	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form  AUSA Ryan Rezaei	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
▼ U.S. Attorney   Other U.S. Agency	,
Name of Assistant U.S.	This report amends AO 257 previously submitted
Attorney (if assigned)  Casey Boome/Ryan Rezaei	
PROCESS:	FORMATION OR COMMENTS
☐ SUMMONS ☐ NO PROCESS* ☑ WARRANT	Bail Amount:
If Summons, complete following: Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or
Defendant Address:	warrant needed, since Magistrate has scheduled arraignment
	Date/Time: Before Judge:
Comments:	

#### PENALTY SHEET

# The defendants are charged as follows:

# 1. LORENZO LEE, a/k/a "O.G."

CR19 0226

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

# 2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))



#### 4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 5. DEBORAH POLK

CR19 0226

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

## 6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

## 8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))



## 10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

## 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

- 1. Imprisonment: Not less than 10 years but up to life
- 2. Fine: \$10 million
- 3. Supervised Release: Not less than 5 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

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Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$1 million
- 3. Supervised Release: Not less than 3 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$500,000
- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO same as those pertaining to Counts 8, 10, 11, and 13
- 2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK sar Garlos parining to 100 (1), 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and 18



AO 257 (Rev. 6/78)

	A ODIMINAL ACTION IN LIC DISTRICT COURT
2000 CONTROL OF THE C	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: ☐ COMPLAINT ☐ INFORMATION ☐ INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDIN	MORTHERN DISTRICT OF CALIFORNIA
See attachment Petty	SAN FRANCISCO DIVISION
Minor	DEFENDANT - U.S
Misde	e- I soong
☐ mean	The picture of the pi
Felon	DISTRICT COURT NUMBER DISTRICT OF CALIFORNIA
PENALTY: See attachment	None
	D 10 0228
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (& Title, if any)	Has not been arrested, pending outcome this proceeding.  1) X If not detained give date any prior
DEA	summons was served on above charges
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district	
per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY
	4) On this charge
this is a reprosecution of	The straige
charges previously dismissed which were dismissed on motion SHOW	5)  On another conviction
of:  OCKET NO.	
U.S. ATTORNEY DEFENSE	If answer to (6) is "Yes", show name of institution
<u>,                                      </u>	
this prosecution relates to a pending case involving this same	Has detainer Yes } If "Yes" give date
defendant MAGISTRATE CASE NO.	been filed? No filed
prior proceedings or appearance(s)	DATE OF Month/Day/Year ARREST
before U.S. Magistrate regarding this defendant were recorded under	Or if Arresting Agency & Warrant were not
Name and Office of Person	DATE TRANSFERRED Month/Day/Year
Furnishing Information on this form  AUSA Ryan Rezaei	TO U.S. CUSTODY
Name of Assistant U.S. Attorney (if assigned)  Casey Boome/Ryan Rezaei	This report amends AO 257 previously submitted
PROCESS: ADDITIONAL INF	ORMATION OR COMMENTS —
SUMMONS NO PROCESS* WARRANT	Bail Amount:
If Summons, complete following:	
Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment
Defendant Address:	
	Date/Time: Before Judge:
Comments:	

#### PENALTY SHEET

# The defendants are charged as follows:

# 1. LORENZO LEE, a/k/a "O.G." CR19 0226

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

# 2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

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Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

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Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

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#### 4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

# 5. DEBORAH POLK

CR19 0226

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

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Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

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## 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

CR19 0226

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Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

- 1. Imprisonment: Not less than 10 years but up to life
- 2. Fine: \$10 million
- 3. Supervised Release: Not less than 5 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
  7. Forfeiture CR19 0226



Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drum

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but up to life
- 4. Special Assessment: \$100
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- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

- 1. Imprisonment: Not more than 20 years
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- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
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- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO same as those pertaining to Counts 8, 10, 11, and 13
- 2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" san Carnet Pataining to 0223, 6 and 18

DECEMBANT INCODMATION DELATIVE T	O A CRIMINAL ACTION IN IL C DICTRICT COURT
	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION INDICTMENT	Traine of Bistilet Goalt, artarol oddge/integistrate Education
OFFENSE CHARGED SUPERSEDIN	
See attachment   Petty	SAN FRANCISCO DIVISION
Mind Misd mean Felor	JOSE DELGADILLO, a/k/a "Tepa" CALIFORA"
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (& Title, if any)	Has not been arrested, pending outcome this proceeding.  1) If not detained give date any prior summons was served on above charges
DEA	-
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
Northern District of California	3) X Is on Bail or Release from (show District)
this person/proceeding is transferred from another district	Northern District of California
this is a reprosecution of charges previously dismissed which were dismissed on motion of:  U.S. ATTORNEY DEFENSE	IS IN CUSTODY  4)  On this charge  5)  On another conviction  6)  Awaiting trial on other charges  If answer to (6) is "Yes", show name of institution
this prosecution relates to a pending case involving this same defendant  MAGISTRATI CASE NO.  prior proceedings or appearance(s) before U.S. Magistrate regarding this  3-19-70655	DATE OF Month/Day/Year ARREST
defendant were recorded under	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form AUSA Ryan Rezaei	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
✓ U.S. Attorney ☐ Other U.S. Agency	
Name of Assistant U.S.	This report amends AO 257 previously submitted
Attorney (if assigned) Casey Boome/Ryan Rezaei	
PROCESS: ADDITIONAL INF	FORMATION OR COMMENTS ————————————————————————————————————
SUMMONS NO PROCESS* WARRANT	Bail Amount:
If Summons, complete following:  Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or
Defendant Address:	warrant needed, since Magistrate has scheduled arraignment
	Date/Time: Before Judge:
Comments:	

#### PENALTY SHEET

# The defendants are charged as follows:

## 1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing

Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 4. DESHAWNTE GAMBOA

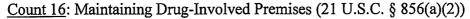
Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))



## 6. EVAN MARTINEZ-DIAZ

CR19 0226

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

## 8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

# 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))



0226



# 10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

## 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

- 1. Imprisonment: Not less than 10 years but up to life
- 2. Fine: \$10 million
- 3. Supervised Release: Not less than 5 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture



Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$1 million
- 3. Supervised Release: Not less than 3 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$500,000
- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO same as those pertaining to Counts 8, 10, 11, and 13
- 2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and 18

AO 257 (Rev. 6/78)

AO 237 (Nev. 0/10)	product as all discrete Parity
DEFENDANT INFORMATION RELATIVE	TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION INDICTMENT	T Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDI	1// / / / / / / / / / / / / / / / / / /
See attachment Pet	SAN FRANCISCO BIMSINY. SOONG
See attachment	NORTH DISTRICT OF CALIFORNIA
	DEFENDANT - U.S
	anor MARCO DELGADILLO, a/k/a "Tonio"
4-23	ony DISTRICT COURT NUMBER OF THE PROPERTY OF T
PENALTY: See attachment	CISTRICT COURT NUMBER 0226
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (& Title, if any)	Has not been arrested, pending outcome this proceeding.
DEA	If not detained give date any prior summons was served on above charges
nerson is awaiting trial in another Federal or State Court	—
give name of court	
Northern District of California	3) X Is on Bail or Release from (show District)
this person/proceeding is transferred from another district	Northern District of California
per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CHISTODY
	IS IN CUSTODY  4) On this charge
this is a reprosecution of	4) Off this charge
charges previously dismissed	5)  On another conviction
which were dismissed on motion of:	o.
U.S. ATTORNEY DEFENSE	6) Awaiting trial on other charges  If answer to (6) is "Yes", show name of institution
<u> </u>	
this prosecution relates to a pending case involving this same	Has detainer Yes If "Yes"
defendant MAGISTRAT	
prior proceedings or appearance(s)	DATE OF Month/Day/Year
before U.S. Magistrate regarding this defendant were recorded under	ARREST 7
	Or if Arresting Agency & Warrant were not  DATE TRANSFERRED Month/Day/Year
Name and Office of Person Furnishing Information on this form AUSA Ryan Rezaei	TO U.S. CUSTODY
☑ U.S. Attorney ☐ Other U.S. Agend	;у
Name of Assistant U.S.	This report amends AO 257 previously submitted
Attorney (if assigned) Casey Boome/Ryan Rezaei	IEODMATION OF COMMENTS
PROCESS: ADDITIONAL IN	IFORMATION OR COMMENTS ————————————————————————————————————
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT	Bail Amount:
If Summons, complete following:	* Where defendant previously apprehended on complaint, no new summons or
Arraignment Initial Appearance  Defendant Address:	warrant needed, since Magistrate has scheduled arraignment
Deletidant Address.	Data/Time:
	Date/Time: Before Judge:
Comments:	

#### PENALTY SHEET

# The defendants are charged as follows:



## 1. LORENZO LEE, a/k/a "O.G."

Count 4: Distribution of Cocaine (21 U.S.C. §§ 84 (a) (7) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing

Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. § Chargeb)(1)(B)) 0226

#### 5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

#### 6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

### 7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

## 8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

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# 10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

- 1. Imprisonment: Not less than 10 years but up to life
- 2. Fine: \$10 million
- 3. Supervised Release: Not less than 5 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture



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Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$1 million
- 3. Supervised Release: Not less than 3 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$500,000
- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture



Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO same as those pertaining to Counts 8, 10, 11, and 13
- 2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17

  CR19
  0226
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and 18



AO 257 (Rev. 6/78)	
DEFENDANT INFORMATION RELATIVE TO	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDIN	
See attachment Petty	SAN FRANCISCO DIVISION 1 4 2010
Minor	SUSAN
Misde	DEFENDANT - U.S   CLERK, U.S. DISTRICT COURT  NORTH DISTRICT COURT  DISTRICT COURT
☐ mean	DEFENDANT - U.S  NORTH DISTRICT COURT  LUIS TORRES-GARCIA, a/k/a "Guero"  LUIS TORRES-GARCIA, a/k/a "Guero"
PENALTY: See attachment	DISTRICT COURT NUMBER
PENALTY: See attachment	None
	CR19 0226
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (& Title, if any)	Has not been arrested, pending outcome this proceeding.  1) X If not detained give date any prior
DEA	summons was served on above charges
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
, A	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district	
per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY
	4)  On this charge
this is a reprosecution of	
charges previously dismissed SHOW which were dismissed on motion	5) On another conviction Federal State
of: DOCKET NO.	6) Awaiting trial on other charges
U.S. ATTORNEY DEFENSE	If answer to (6) is "Yes", show name of institution
this prosecution relates to a pending case involving this same	Has detainer Yes If "Yes"
defendant MAGISTRATE	l l dive date
prior proceedings or appearance(s)	DATE OF Month/Day/Year
before U.S. Magistrate regarding this defendant were recorded under	ARREST 7
	Or if Arresting Agency & Warrant were not  DATE TRANSFERRED Month/Day/Year
Name and Office of Person  Furnishing Information on this form AUSA Ryan Rezaei	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
□ U.S. Attorney        Other U.S. Agency	
Name of Assistant U.S.	This report amends AO 257 previously submitted
Attorney (if assigned)  Casey Boome/Ryan Rezaei	ORMATION OR COMMENTS —
PROCESS:	ORMATION OR COMMENTS
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT	Bail Amount:
If Summons, complete following:  Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment
Defendant Address:	martant necessar, since magistrate has sometimed arrangiment
	Date/Time: Before Judge:
Comments:	

#### PENALTY SHEET

The defendants are charged as follows:

CR19 0226



- 1. LORENZO LEE, a/k/a "O.G."
  - Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))
  - Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))
  - Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))
  - Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))
  - Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))
  - Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 2. JEFFREY MCCOY

- Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))
- Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))
- Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))
- Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))
- Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))
- Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))
- Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))
- Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

# 3. ANTHONY BROWN, a/k/a "Ant Man"

- Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))
- Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 USTR§ 1416(1) and (b) 226

#### 5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

#### 6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

## 8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and



Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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## 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

# 10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

# 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life

2. Fine: \$10 million

3. Supervised Release: Not less than 5 years but up to life

4. Special Assessment: \$100

5. Denial of Federal Benefits

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6. Immigration Consequences Including Possible Deportation

7. Forfeiture

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years

2. Fine: \$5 million

3. Supervised Release: Not less than 4 years but up to life

4. Special Assessment: \$100

5. Denial of Federal Benefits

6. Immigration Consequences Including Possible Deportation

7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years

2. Fine: \$1 million

3. Supervised Release: Not less than 3 years but up to life

4. Special Assessment: \$100

5. Denial of Federal Benefits

6. Immigration Consequences Including Possible Deportation

7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years

2. Fine: \$500,000

3. Supervised Release: Not more than 3 years

4. Special Assessment: \$100

5. Denial of Federal Benefits

6. Immigration Consequences Including Possible Deportation

7. Forfeiture



Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO same as those pertaining to Counts 8, 10, 11, and 13
- 2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and 18



AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE T	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDIN	W/AV 7 A 2040
See attachment Petty	SAN FRANCISCO DIVISION 2019
Mino	SUSAN Y. SOONG  CLERK, U.S. DISTRICT COU-
Misd	e- NORTH DISTRICT OF CALIFOR
mean —	7
PENALTY: See attachment	DISTRICT COURT NUMBER
	CR19 0226
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY  Has not been arrested, pending outcome this proceeding.
Name of Complaintant Agency, or Person (& Title, if any)	1) If not detained give date any prior
DEA	summons was served on above charges
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
Northern District of California	3) X Is on Bail or Release from (show District)
this person/proceeding is transferred from another district	Northern District of California
per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY
	4) On this charge
this is a reprosecution of	
charges previously dismissed SHOW which were dismissed on motion	5) On another conviction Federal State
of:	6) Awaiting trial on other charges
U.S. ATTORNEY DEFENSE	If answer to (6) is "Yes", show name of institution
this prosecution relates to a	Has detainer Yes 1 If "Yes"
pending case involving this same defendant MAGISTRATI	Has detainer L. J. Give date
CASE NO.	DATE OF Month/Day/Year
prior proceedings or appearance(s)  before U.S. Magistrate regarding this  3-19-70662	ARREST
defendant were recorded under	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form  AUSA Ryan Rezaei	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
✓ U.S. Attorney ☐ Other U.S. Agency	
Name of Assistant U.S.	This report amends AO 257 previously submitted
Attorney (if assigned)  Casey Boome/Ryan Rezaei	COPMATION OF COMMENTS
PROCESS:	FORMATION OR COMMENTS ————————————————————————————————————
SUMMONS NO PROCESS* WARRANT	Bail Amount:
If Summons, complete following:  Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or
Defendant Address:	warrant needed, since Magistrate has scheduled arraignment
	Date/Time: Before Judge:
Comments:	

#### PENALTY SHEET

## The defendants are charged as follows:



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#### 1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 5. DEBORAH POLK

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Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

#### 6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

#### 7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

#### 8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

## 9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

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## 10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

## 11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

#### 12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

## 13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

- 1. Imprisonment: Not less than 10 years but up to life
- 2. Fine: \$10 million
- 3. Supervised Release: Not less than 5 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

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Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

- 1. Imprisonment: Not less than 5 years and not more than 40 years
- 2. Fine: \$5 million
- 3. Supervised Release: Not less than 4 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$1 million
- 3. Supervised Release: Not less than 3 years but up to life
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

- 1. Imprisonment: Not more than 20 years
- 2. Fine: \$500,000
- 3. Supervised Release: Not more than 3 years
- 4. Special Assessment: \$100
- 5. Denial of Federal Benefits
- 6. Immigration Consequences Including Possible Deportation
- 7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

- 1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO same as those pertaining to Counts 8, 10, 11, and 13
- 2. JEFFREY MCCOY, ANTHONY BROW Land Art. Ian," DES 12 G GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
- 3. JOSE DELGADILLO, a/k/a "Tepa" same as those pertaining to Counts 3, 4, 5, and 18

# United States District Court

# **NORTHERN DISTRICT OF CALIFORNIA**

INDICTMENT

FILED

MAY 1 4 2019

SUSAN Y. SOONG CLERK, U.S. DISTRICT COURT NORTH DISTRICT OF CALIFORNIA

U.S. v. LORENZO LEE a/k/a "O.G.", et al.

**DEFENDANTS' CONTINUATION LIST** (Page 1 of 1)

UNITED STATES OF AMERICA,

RS

Plaintiff,

CR19 0226

v.

JEFFREY MCCOY, ANTHONY BROWN. a/k/a "Ant Man," DESHAWNTE GAMBOA. DEBORAH POLK, EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO, JESSE LOPEZ, III, JOSE DELGADILLO, a/k/a "Tepa," MARCO DELGADILLO, a/k/a "Tonio," LUIS TORRES-GARCIA, a/k/a "Guero," and TIMOTHY PEOPLES, a/k/a "Tee,"

DAVID L. ANDERSON (CABN 149604) 1 United States Attorney 2 FILED 3 MAY 14 2819 4 5 SUSAN Y. SOONG CLERK, U.S. DISTRICT COUPT NORTH DISTRICT OF CALIFORNIA 6 7 UNITED STATES DISTRICT COURT 8 9 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO CLYISION 10 0226 CASE NO. 11 UNITED STATES OF AMERICA. Plaintiff. **VIOLATIONS:** 12 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to 13 v. Distribute and Possess with Intent to Distribute Controlled Substances (Two Counts); LORENZO LEE, 21 U.S.C. § 841(a)(1) – Distribution of Controlled Substances (Seven Counts); 14 a/k/a "O.G.," JEFFREY MCCOY, 15 21 U.S.C. § 841(a)(1) – Possession with Intent to ANTHONY BROWN, Distribute Controlled Substances (Eight Counts); a/k/a "Ant Man," 21 U.S.C. § 856(a)(2) – Maintaining Drug-Involved 16 DESHAWNTE GAMBOA, Premises: DEBORAH POLK, 18 U.S.C. § 2 – Aiding and Abetting; 21 U.S.C. § 853 – Forfeiture Allegation 17 EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, 18 CESAR ALVARADO, SAN FRANCISCO DIVISION 19 JESSE LOPEZ, III, JOSE DELGADILLO, a/k/a "Tepa," MARCO DELGADILLO, 20 a/k/a "Tonio," 21 LUIS TORRES-GARCIA, a/k/a "Guero," and 22 TIMOTHY PEOPLES, 23 a/k/a "Tee," Defendants. 24 25 26 27 28

## INDICTMENT

COUNT ONE:

(21 U.S.C. §§ 846 and 841(a)(1) – Conspiracy to Distribute and Possess with Intent to Distribute Cocaine, Cocaine Base, Heroin, Fentanyl, and Methamphetamine)

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Beginning on or about August 30, 2017, and continuing to on or about April 30, 2019, in the Northern District of California and elsewhere, the defendants,

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LORENZO LEE, a/k/a "O.G.." JEFFREY MCCOY. ANTHONY BROWN. a/k/a "Ant Man." DESHAWNTE GAMBOA. DEBORAH POLK. EVAN MARTINEZ-DIAZ. MAGO AGUILAR-PACHECO. CESAR ALVARADO, and JOSE DELGADILLO, a/k/a "Tepa,"

and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a mixture and substance containing a detectable amount of fentanyl, a Schedule IV controlled substance, and methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

With respect to LORENZO LEE, a/k/a "O.G.," his conduct as a member of the conspiracy, which includes the reasonably foreseeable conduct of other members of the conspiracy, involved 28 grams and more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United

States Code, Sections 841(a)(1) and (b)(1)(A), and 500 grams and more of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

With respect to JEFFREY MCCOY, his conduct as a member of the conspiracy, which includes the reasonably foreseeable conduct of other members of the conspiracy, involved 28 grams and more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and 100 grams and more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

With respect to ANTHONY BROWN, a/k/a "Ant Man," his conduct as a member of the conspiracy, which includes the reasonably foreseeable conduct of other members of the conspiracy, involved 28 grams and more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

With respect to DESHAWNTE GAMBOA, his conduct as a member of the conspiracy, which includes the reasonably foreseeable conduct of other members of the conspiracy, involved 100 grams and more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

With respect to EVAN MARTINEZ-DIAZ, his conduct as a member of the conspiracy, which includes the reasonably foreseeable conduct of other members of the conspiracy, involved 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and 500 grams and more of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

With respect to MAGO AGUILAR-PACHECO, his conduct as a member of the conspiracy,

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which includes the reasonably foreseeable conduct of other members of the conspiracy, involved 500
grams and more of a mixture and substance containing a detectable amount of cocaine, its salts, optical
and geometric isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title
21, United States Code, Sections 841(a)(1) and (b)(1)(B).

With respect to CESAR ALVARADO, his conduct as a member of the conspiracy, which includes the reasonably foreseeable conduct of other members of the conspiracy, involved five kilograms and more of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), 100 grams and more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

With respect to DEBORAH POLK, her conduct as a member of the conspiracy, which includes the reasonably foreseeable conduct of other members of the conspiracy, involved 100 grams and more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

> (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base)

On or about September 6, 2017, in the Northern District of California, the defendant, JEFFREY MCCOY,

did knowingly and intentionally distribute 28 grams and more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THREE: (21 U.S.C. §§ 841(a)(1) and (b)(1)(C) – Distribution of Heroin)

On or about September 28, 2017, in the Northern District of California, the defendant, JEFFREY MCCOY,

COUNT TWO:

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- 1	did knowingly and intentionally distribute a mixture and substance containing a detectable amount of
2	heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections
3	841(a)(1) and (b)(1)(C).
4	COUNT FOUR: (21 U.S.C. §§ 841(a)(1) and (b)(1)(C) – Distribution of Cocaine)
5	On or about November 2, 2017, in the Northern District of California, the defendants,
6	JEFFREY MCCOY,
7	LORENZO LEE,
8	a/k/a "O.G.,"
9	did knowingly and intentionally distribute a mixture and substance containing a detectable amount of
10	cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled
11	substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18,
12	United States Code, Section 2.
13	COUNT FIVE: (21 U.S.C. §§ 841(a)(1) and (b)(1)(C) – Distribution of Heroin)
14	On or about December 7, 2017, in the Northern District of California, the defendant,
15	JEFFREY MCCOY,
16	did knowingly and intentionally distribute a mixture and substance containing a detectable amount of
17	heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections
18	841(a)(1) and (b)(1)(C).
19	COUNT SIX: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base)
20	Whature and Substance Containing Cocame Base)
21	On or about January 11, 2018, in the Northern District of California, the defendant,
22	JEFFREY MCCOY,
22 23	JEFFREY MCCOY,  did knowingly and intentionally distribute 28 grams and more of a mixture and substance containing a
23	did knowingly and intentionally distribute 28 grams and more of a mixture and substance containing a
23 24	did knowingly and intentionally distribute 28 grams and more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).  COUNT SEVEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Distribution of 28 Grams and More of a
23 24 25	did knowingly and intentionally distribute 28 grams and more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

1	JEFFREY MCCOY,
2	LORENZO LEE, a/k/a "O.G.,"
3	and ANTHONY BROWN,
4	a/k/a "Ant Man,"
5	did knowingly and intentionally distribute 28 grams and more of a mixture and substance containing a
6	detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United
7	States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.
8	COUNT EIGHT: (21 U.S.C. §§ 841(a)(1) and (b)(1)(A) – Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl)
10	On or about May 15, 2018, in the Northern District of California, the defendant,
11	JESSE LOPEZ, III,
12	did knowingly and intentionally possess with intent to distribute 400 grams and more of a mixture and
13	substance containing a detectable amount of fentanyl, a Schedule IV controlled substance, in violation of
14	Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).
15	COUNT NINE: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin)
16	,
17	On or about August 13, 2018, in the Northern District of California, the defendants,
18	JEFFREY MCCOY, and
19	DESHAWNTE GAMBOA,
20	did knowingly and intentionally distribute 100 grams and more of a mixture and substance containing a
21	detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States
22	Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.
23	COUNT TEN: (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) – Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance
24	Containing a Detectable Amount of Methamphetamine)
25	Beginning on or about May 5, 2018, and continuing to on or about February 17, 2019, in the
26	Northern District of California and elsewhere, the defendants,
27	JOSE DELGADILLO, a/k/a "Tepa,"
28	MARCO DELĜADILLO, a/k/a "Tonio,"
	INDICTMENT 6
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1	and LUIS TORRES-GARCIA,
2	a/k/a "Guero,"
3	and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to distribu
4	and possess with the intent to distribute 500 grams and more of a mixture and substance containing a
5	detectable amount of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II
6	controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and
7	(b)(1)(A).
8	COUNT ELEVEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(A) – Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine)
10	On or about February 9, 2019, in the Northern District of California, the defendant,
11	CESAR ALVARADO,
12	did knowingly and intentionally possess with intent to distribute five kilograms and more of a mixture
13	and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and
14	salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code,
15	Sections 841(a)(1) and (b)(1)(A).
16 17	COUNT TWELVE: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin)
18	On or about February 9, 2019, in the Northern District of California, the defendant,
19	CESAR ALVARADO,
20	did knowingly and intentionally possess with intent to distribute 100 grams and more of a mixture and
21	substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of
22	Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).
23 24	COUNT THIRTEEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(A) – Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine)
25	On or about February 9, 2019, in the Northern District of California, the defendants,
26	LORENZO LEE,
27	a/k/a "O.G.," CESAR ALVARADO,
28	and EVAN MARTINEZ-DIAZ,

1	did knowingly and intentionally possess with intent to distribute 500 grams and more of a mixture and
2	substance containing a detectable amount of methamphetamine, its salts, isomers and salts of its
3	isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
4	841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.
5	COUNT FOURTEEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Possession with Intent to
6	Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine)
7	On or about February 9, 2019, in the Northern District of California, the defendants,
8	LORENZO LEE, a/k/a "O.G.,"
9	CESAR ALVARADO,
10	EVAN MARTINEZ-DIAZ,
11	did knowingly and intentionally possess with intent to distribute 500 grams and more of a mixture and
12	substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts
13	of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
14	841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.
15	COUNT FIFTEEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Possession with Intent to Distribute Heroin)
16	On or about April 30, 2019, in the Northern District of California, the defendants,
17	LORENZO LEE, a/k/a "O.G.,"
18	and
19	DEBORAH POLK,
20	did knowingly and intentionally possess with intent to distribute 100 grams and more of a mixture and
21	substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of
22	Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section
23	2.
24	COUNT SIXTEEN: (21 U.S.C. § 856(a)(2) – Maintaining Drug-Involved Premises)
25	On or about April 30, 2019, in the Northern District of California, the defendant,
26	DEBORAH POLK,
27	did unlawfully, knowingly and intentionally manage and control a house at 3412 Serpentine Dr.,
28	Antioch, California, as an owner, lessee, agent, employee, occupant, and mortgagee, and made available

1	for use, with or without compensation, said place for the purpose of unlawfully manufacturing, storing
2	and distributing a mixture and substance containing a detectable amount of heroin, a Schedule I
3	controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).
4 5	COUNT SEVENTEEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base)
6	On or about April 30, 2019, in the Northern District of California, the defendant,
7	TIMOTHY PEOPLES, a/k/a "Tee,"
8	
9	did knowingly and intentionally possess with intent to distribute 28 grams and more of a mixture and
10	substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in
11	violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).
12	COUNT EIGHTEEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(C) – Possession with Intent to Distribute Cocaine)
13	,
14	On or about April 30, 2019, in the Northern District of California, the defendant,
15 16	TIMOTHY PEOPLES, a/k/a "Tee,"
17	did knowingly and intentionally possess with intent to distribute a mixture and substance containing a
18	detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a
19	Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and
20	(b)(1)(C).
21	FORFEITURE ALLEGATION: (21 U.S.C. § 853(a))
22	The allegations contained above are hereby re-alleged and incorporated by reference for the
23	purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).
24	Upon conviction of any of the offenses set forth in this Indictment, the defendants,
25	LORENZO LEE,
26	a/k/a "O.G.,"  JEFFREY MCCOY,
27	ANTHONY BROWN, a/k/a "Ant Man,"
28	DESHAWNTE GAMBOA, DEBORAH POLK, EVAN MARTINEZ-DIAZ,

1 MAGO AGUILAR-PACHECO, CESAR ALVARADO, 2 JESSE LOPEZ, III, JOSE DELGADILLO. a/k/a "Tepa," 3 MARCO DELGADILLO, a/k/a "Tonio," 4 LUIS TORRES-GARCIA, 5 a/k/a "Guero," and 6 TIMOTHY PEOPLES, a/k/a "Tee," 7 shall forfeit to the United States all right, title, and interest in any property constituting and derived from 8 9 any proceeds defendant obtained, directly or indirectly, as a result of such violations, and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such 10 11 violations. If any of the property described above, as a result of any act or omission of the defendants: 12 13 cannot be located upon exercise of due diligence; has been transferred or sold to, or deposited with, a third party; 14 b. has been placed beyond the jurisdiction of the court; 15 c. d. has been substantially diminished in value; or 16 has been commingled with other property which cannot be divided without 17 e. 18 difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, 19 20 United States Code, Section 853(p). 21 // 22 // 23 // 24 // 25 // 26 // 27 // 28

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All pursuant to Title 21, United States Code, Section 853, and Federal Rule of Criminal Procedure 32.2. DATED: MAY 14,2019 A TRUE BILL. DAVID L. ANDERSON United States Attorney CASEY BOOME Assistant United States Attorney 

INDICTMENT